

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	Case No. 19 CR 366
	:	
-against-	:	NOTICE OF MOTION
	:	
STEPHEN M. CALK,	:	
	:	
Defendant.	:	
-----:	:	

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior proceedings in this action, third parties James Brennan, Thomas Horn, Matthew MacDonald and Javier Ubarri (collectively “Illinois Witnesses”), through their undersigned attorney, will move this Court before the Honorable Lorna G. Schofield, United States District Judge, at the United States Courthouse for the Southern District of New York, at a date and time to be determined this Court, for an order quashing or modifying the trial subpoenas served upon them, and for any other relief as the Court may deem just and proper.

The Illinois Witnesses respectfully request oral argument in connection with this motion.

Dated: January 8, 2021

Respectfully submitted,

A&G Law LLC

By: /s/ Robert M. Andalman
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